

Hearing Date and Time:
October 3, 2019 at 10:00 a.m.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:
SEARS HOLDING CORPORATION, *et al.*,
Debtors.¹ -----X
Case No. 18-23538 (RDD)

Chapter 11
(Jointly Administered)

**JOINDER BY BH NORTH AMERICAN CORPORATION TO
SUPPLEMENTAL OBJECTION OF MIEN CO. LTD. ET AL TO
CONFIRMATION OF THE MODIFIED SECOND AMENDED JOINT
CHAPTER 11 PLAN OF SEARS HOLDINGS CORPORATION AND ITS
AFFILIATED DEBTORS AND TO
TERMINATE EXCLUSIVITY [DOC 5266]**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innoval Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

TO THE HONORABLE ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE:

BH NORTH AMERICAN CORPORATION (“BH NA”), by its attorneys, Higgs, Fletcher & Mack LLP, submits this joinder to the supplemental objection of Mien Co. Ltd. *et al* to confirmation of the modified second amended joint chapter 11 plan (“Plan”) of Sears Holdings Corporation and its affiliated debtors and to terminate exclusivity (the “Mien Supplemental Objection”) [Doc 5266], and represents and says as follows:

1. BH NA is an administrative creditor of this estate. BH NA joins in and supports the Mien Supplemental Objection.
2. The Court should not confirm the Plan.

Dated: Saratoga Springs, New York
October 1, 2019

Respectfully submitted,

CARTER, CONBOY CASE,
BLACKMORE, MALONEY &
LAIRD, P.C.

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